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**From:** Goodwin, Cathleen@Waterboards [Cathleen.Goodwin@waterboards.ca.gov]  
**Sent:** 11/13/2018 7:25:46 PM  
**To:** Polek, Jim [Polek.Jim@epa.gov]; Whitson, Amelia [Whitson.Amelia@epa.gov]  
**Subject:** RE: EPA Inspection Report (Pacific Choice Seafood, Eureka, CA)

Hi Jim:

Thank you to you and Amelia for getting back to me. This morning, I reached out to Sirese and Chuck to see if they have run into this situation at any seafood processing facilities. during their pretreatment inspections. I will also reach out to the coastal regional board offices.

Cathy

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**From:** Polek, Jim <Polek.Jim@epa.gov>  
**Sent:** Tuesday, November 13, 2018 10:48 AM  
**To:** Amelia Whitson <Whitson.Amelia@epa.gov>; Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>  
**Subject:** RE: EPA Inspection Report (Pacific Choice Seafood, Eureka, CA)

Hi Cathy,

Thanks for including Amelia on this email. She is a better resource than me.

I too do not have any experience with seafood industries. I like Amelia's suggestion of talking with other coastal Boards and Hawaii DOH.

I am sure that we will be discussing Pacific Choice Seafood in the near future, especially once we receive their response to the report. Any information you can find about possible permitting options will be useful in deciding what we require the facility to do to come into compliance.

Good luck and talk to you soon.

Jim

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**From:** Whitson, Amelia  
**Sent:** Friday, November 09, 2018 3:16 PM  
**To:** Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>  
**Cc:** Polek, Jim <Polek.Jim@epa.gov>  
**Subject:** RE: EPA Inspection Report (Pacific Choice Seafood, Eureka, CA)

Hi Cathy,

I've unfortunately not worked with seafood industries before, so I don't have any direct insight into how their wastestreams are typically handled. However, the Development Documents for this ELG category may be of interest, as they describe wastestreams by subcategory process, as well as available/practicable control and treatment technologies:

[Development Document for the Fish Meal, Salmon, Bottom Fish, Clam, Oyster, Sardine, Scallop, Herring, and Abalone Segment \(PDF\)](#)

## Development Document for the Catfish, Crab, Shrimp and Tuna Segment (PDF)

Additionally, if you have contacts at any of the other coastal Boards, I imagine they might have some experience with industries like this...? If you wanted to check with Hawaii as well, the manager of their NPDES Permits office there is Darryl Lum, [darryl.lum@doh.hawaii.gov](mailto:darryl.lum@doh.hawaii.gov), (808) 586-4309. Please let me know if you have any other questions in the meantime.

Best,

Amelia Whitson  
NPDES Permits Office (WTR-2-3)  
US EPA, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
(415) 972-3216

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**From:** Goodwin, Cathleen@Waterboards <[Cathleen.Goodwin@waterboards.ca.gov](mailto:Cathleen.Goodwin@waterboards.ca.gov)>

**Sent:** Thursday, November 8, 2018 4:19 PM

**To:** Whitson, Amelia <[Whitson.Amelia@epa.gov](mailto:Whitson.Amelia@epa.gov)>

**Cc:** Polek, Jim <[Polek.Jim@epa.gov](mailto:Polek.Jim@epa.gov)>

**Subject:** RE: EPA Inspection Report (Pacific Choice Seafood, Eureka, CA)

Hi Amelia:

I meant to cc you on this email to Jim regarding NPDES discharges from the Pacific Choice Seafood facility in Eureka. Let me know your thoughts on this.

Cathy

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**From:** Goodwin, Cathleen@Waterboards

**Sent:** Thursday, November 08, 2018 4:17 PM

**To:** 'Polek, Jim' <[Polek.Jim@epa.gov](mailto:Polek.Jim@epa.gov)>

**Subject:** RE: EPA Inspection Report

Hi Jim:

Our office has been contacted by someone on behalf of Pacific Choice Seafood to inquire about permitting options for the current discharges to Humboldt Bay from this facility, including the fish deicing operation, oyster processing, and the crab holding tanks. I initially thought that this might be something that we could consider covering under our Region's Low Threat General Permit for NPDES discharges. I looked through the permit today and see that one of the ineligible discharge categories is "Discharges from industrial facilities that are subject to Effluent Limitation Guidelines promulgated by the U.S. EPA pursuant to CWA section 304(b), which limits the discharge of pollutants from these facilities."

Based on this finding, we will need to identify another way to permit this discharge. I'd like to avoid having to do an individual permit if we can help it. I'd like to find out what the volumes of these various wastewater streams are. It seems like they might be able to direct the oyster rinsing water to their pretreatment system and thence to Eureka's collection system, if the rinse water is freshwater rather than saline. I don't think that the fish deicing or crab holding tank water could be directed to the City's system because it is saline water.

Are you aware of how other fish deicing and crab holding tank operations are handled at other facilities?

Thanks,  
Cathy

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**From:** Polek, Jim <[Polek.Jim@epa.gov](mailto:Polek.Jim@epa.gov)>  
**Sent:** Monday, October 15, 2018 2:51 PM  
**To:** [rharris@pacseafood.com](mailto:rharris@pacseafood.com)  
**Cc:** David Adams <[dadams@ci.eureka.ca.gov](mailto:dadams@ci.eureka.ca.gov)>; Goodwin, Cathleen@Waterboards  
<[Cathleen.Goodwin@waterboards.ca.gov](mailto:Cathleen.Goodwin@waterboards.ca.gov)>; [dbodiroga@pacseafood.com](mailto:dbodiroga@pacseafood.com)  
**Subject:** EPA Inspection Report

Mr. Harris,

Please find attached EPA's inspection report for the pretreatment inspection conducted at your facility on August 15, 2018. A hard copy of the report will be mailed to you. Thanks.

Jim

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James Polek  
Environmental Engineer  
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US Environmental Protection Agency Region IX  
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San Francisco, CA 94105  
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